

**Before the
Federal Communications Commission
Washington, D.C. 20554**

In the Matter of)	
)	
Digital Audio Broadcasting Systems)	
And Their Impact On the Terrestrial Radio)	MM Docket No. 99-325
Broadcast Service)	

Reply Comments of Shively Labs

Shively Labs (“Shively”) hereby submits these Reply Comments concerning separate antenna digital radio implementations. Shively supports the proposal to the Commission to authorize separate antenna implementations. In addition, Shively encourages the Commission to explicitly endorse interleaved or stack antenna systems as part of its separate antenna authorization.

Shively has been designing and manufacturing professional broadcast antennas for over 35 years for installations across the globe. Today, Shively is a leading manufacturer in the broadcast antenna industry, supplying products to over 100 countries. Shively has been an early innovator developing products for HD Radio implementations. Shively has developed an IBOC filter-injector, which is certified to be compatible with iBiquity Digital Corporation’s technology. Shively also offers broadcasters an interleaved analog/digital antenna system that is designed to reduce the tower space requirements for implementation of digital radio.

Shively endorses the NAB report to the FCC and the request for FCC authorization of separate antenna systems. Moreover, Shively notes the strong support the NAB proposal has received from the numerous broadcasters that filed comments.

Both the NAB report to the FCC and the FCC's public notice note that interleaved or stacked antenna systems can be considered separate antenna implementations. Although the interleaved systems do not use a separately licensed auxiliary antenna for the digital signal, the interleaved digital antenna within the antenna system complies with the horizontal and vertical spacing requirements set out in the NAB proposal. Therefore, there is no risk of additional interference from these systems.

In order to provide broadcasters with the greatest range of options for HD Radio implementations, Shively encourages the Commission to explicitly authorize interleaved or stacked antenna systems as part of its authorization of separate antenna implementations so long as the overall antennas structure is a licensed facility. The record supports the conclusion that these types of implementations will reduce conversion costs and promote the adoption of digital radio.

Respectfully submitted,

Paul A. Wescott, Esq., CEO
Shively Labs
P.O. Box 389, 188 Harrison Rd.
Bridgton, ME 04009
(207) 647-3327

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